

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

BRENDA BROWN ELLINGTON

Plaintiff,

v.

Civil Action Number: _____

NATIONAL AERONAUTICS and
SPACE ADMINISTRATION (NASA),
NATIONAL SHARED SERVICES
CENTER (NSSC), and METLIFE
LIFE INSURANCE CO. and OFFICE
OF FEDERAL EMPLOYEE GROUP
LIFE INSURANCE (OFEGLI),

Defendants.

NOTICE OF REMOVAL

TO: The United States District Court for the Southern District of Texas:

PLEASE TAKE NOTICE THAT, pursuant to Title 28 U.S.C. § 1446(a),
Defendant United States of America respectfully files this Notice of Removal and
in support thereof shows the following:

1. On February 17, 2016, an action was commenced by plaintiff Brenda Brown Ellington (“Plaintiff”) Against “National Aeronautics and Space Administration (NASA), National Shared Services Center (NSSC), Metlife Life Insurance Co. and Office Of Federal Employee Group Life Insurance (OFEGLI),” (“Defendants”) in the 61st District Court of Harris County, Texas, Cause No. 2016-01421. The documents filed by plaintiff in State court are attached as Exhibit 1. Defendants have not yet been served.
2. Because Defendants are agencies of the United States, removal is proper under 28 U.S.C. § 1442(a) (1).
3. Written notice of the filing of the Notice of Removal has been served on Plaintiff, and a copy of the Notice of Removal will be filed with the Clerk of the District Court of Harris County, Texas. A copy of the Notice to State Court of Filing of Notice of Removal, without exhibits, is attached hereto as Exhibit 3.
4. The counsel of record in the state court action is as follows:

Timberly J. Davis & Bryan Terhune

Attorney for Plaintiff

WHEREFORE, the undersigned respectfully requests that this matter be removed from the 61st District Court of Harris County, Texas to this Honorable Court.

Date: March 3, 2016

Respectfully submitted,

KENNETH MAGIDSON
UNITED STATES ATTORNEY

By: s/ Charmaine Aarons Holder
Charmaine Aarons Holder
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Counsel for Federal Respondents

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2016, a true and correct copy of the foregoing was sent by first-class mail to the plaintiff at the following addresses:

Parties/Attorney(s):	For:	Served by:
T.J. Davis Law Firm, PLLC Att: Timberly J. Davis & Bryan Terhune 1314 Texas Ave., Suite 712 Houston, Texas 77002	Attorney for Petitioner	via first class mail, postage prepaid and/or email

By: s/ Charmaine Aarons Holder
Charmaine Aarons Holder
Assistant United States Attorney